

ADMINISTRATIVE REQUIREMENTS

Table of Contents

CHAPTER 2: ADMINISTRATIVE REQUIREMENTS	2
CONFLICT OF INTEREST	2
Waiver Process.....	2
RECORDKEEPING	4
FILES	4
1. GRANT APPLICATION.....	4
2. GRANT AGREEMENT	5
3. PROCUREMENT.....	5
4. ENVIRONMENTAL REVIEW	6
5. ACQUISITION/RELOCATION (if applicable).....	6
6. EQUAL OPPORTUNITY (EO)	6
7. LABOR STANDARDS – files must be organized by Prime Contractor, including subcontractor(s)	6
8. FINANCIAL MANAGEMENT	7
9. REPORTS	7
10. CLOSEOUT.....	8
11. SINGLE AUDIT	8
GRANT AGREEMENT	8
MONITORING.....	9
1. Desk Monitoring	9
2. On-site Monitoring Visit.....	9
ATTACHMENTS.....	10
ATTACHMENT 2-A: SELF-MONITORING CHECKLIST	11
ATTACHMENT 2-B: Title 24 PART 570 Subpart I	23
ATTACHMENT 2-C: PROJECT SIGN SPECIFICATIONS	25
ATTACHMENT 2-D: EXAMPLE PROJECT SIGN.....	26
ADDITIONAL NOTES: (optional)	27
ADDITIONAL NOTES (continued): (optional)	28

CHAPTER 2: ADMINISTRATIVE REQUIREMENTS

CONFLICT OF INTEREST

The conflict of interest provision applies to any individual who is an employee, agent, consultant, officer, or elected official or appointed official of the state, or of a unit of general local government, or of any designated public agencies, or sub-recipients. Except for eligible administrative or personnel costs, the general rule is that **no persons described above** (who exercise or have exercised any functions or responsibilities with respect to CDBG activities and who are in a position to participate in a decision-making process or gain inside information with regard to such activities) may:

- obtain a financial interest or benefit from the activity, or
- have an interest or benefit from the activity, or
- have an interest in any contract, subcontract or agreement with respect thereto, or the proceeds thereunder

either for themselves or those with whom they have family or business ties during their tenure or for one year thereafter.

Waiver Process

An exception to the requirement (Waiver of Potential Conflict of Interest) may be requested from the Division of Housing (DOH). Prior to submitting the request, public disclosure of the conflict must be made. An opinion must be obtained from the Municipal Attorney stating that the interest for which the exemption is sought would not violate state or local law.

Use the following steps to determine a potential conflict of interest:

1. Identify “covered persons” for your CDBG program.
2. Add conflict of interest question to the bidding documentation. All conflict of interest questions must be answered by potential bidders.
3. Inform bidders with potential conflict of interest that their name will be disclosed at the local Board/Council meeting.
4. Add “disclosure of potential conflicts of interest” as discussion item on your Board/Council/Committee agenda.

5. The covered person should not attend this meeting.
6. After bidders have been identified, disclose the names and the nature of the conflicts of interest (type of family or business tie) for applicable Public Facilities projects.
7. Ask all in attendance at the bid approval meeting if there are any objections to awarding the bidder(s) in question. The objective is to ask the public whether they have objections to awarding the CDBG funds to a person with potential conflict of interest.
8. The Grantee's attorney must certify that the identified potential conflict would not violate state or local law, Request for Exception to Conflict of Interest Provision, specifies the format for that certification.
9. Submit "REQUEST FOR EXCEPTION TO CONFLICT OF INTEREST PROVISION" on municipal letterhead, signed by your attorney, and the agenda and minutes of the meeting to Division of Housing.
10. DO NOT sign any project documents until you have received waiver decision from DOH.

In order to assess whether there is an apparent conflict of interest, the Grantee must gather this information at the point of bid submittal. The following question must be included on the initial bid form:

Do you have family or business ties to any of the following people?
___yes ___no

A list of covered persons must be included on the form. The bidders must answer this question regardless there is a relationship or not.

Please become familiar with the language included in the Code of Federal Regulations before you execute any projects paid with CDBG funds. For more information, please refer to Attachment 2-B (included with this Chapter) along with this link:

http://portal.hud.gov/hudportal/HUD?src=/program_offices/comm_planning/lawsregs

IMPORTANT REMINDER!

The Grantee's Chief Elected Official may not receive a CDBG loan or any financial interest from the CDBG activity.

RECORDKEEPING

The Unit of General Local Government (UGLG) shall prepare, keep, maintain and submit to DOH all records required to evidence compliance with the CDBG Program. This may include all contracts relating to the implementation of the Grant Agreement. Such records shall be retained indefinitely until written notification from the DOH. Prior to disposal of any record the Grantee shall send a request to the DOH, and only upon written confirmation from the Division Administrator or his/her designee, may the records in question be disposed of.

FILES

Generally, all files should be kept at the UGLG's official location. If an UGLG decides to establish an electronic record-keeping system, it is recommended to retain hard copies of documents with original signatures. The electronic system must be secure. Documents shall be stored on the network location protected with a password. Only designated personnel shall have access to the CDBG project electronic data. The system must also be accessible to DOH representatives, HUD representatives, and auditors. The UGLG should maintain the following files & documentation:

1. GRANT APPLICATION

- a. Application with signed Eligibility Certification, as submitted to the DOH
- b. CDBG Application Public Hearing Notice
- c. CDBG Application Public Hearing Minutes and/or Public Hearing Certification
- d. CDBG Application Public Hearing Completed Sign-In Sheet.
- e. Citizen Participation Plan
- f. Citizen Participation Plan Adopting Resolution.
- g. Lobbying Certification form
- h. Statement of Assurances
- i. Fair Housing Actions Plan
- j. Fair Housing Action Plan documentation of activities completed
- k. Income Survey methodology, including documentation of survey distribution process, and survey response calculations (if applicable)
- l. Income Survey completed/returned surveys (if applicable).
- m. Income Survey area map (if applicable)
- n. Application Correspondence

2. GRANT AGREEMENT

- a. Award Letter
- b. Grant Agreement
- c. Grant Agreement Amendment(s) (if applicable).
- d. Grant Agreement Correspondence

3. PROCUREMENT

- a. Grantee's Procurement Policy
- b. Conflict of Interest Evidenced Waiver Process (if applicable)
- c. Evidence of open, free, and fair procurement practices related to the recruitment and hiring of contractors, consultants, inspectors, engineers, attorneys, and auditors, each of which must include:
 - 1) Project specifications
 - 2) Copy of sealed bid process and bid opening requirements
 - 3) Request for Proposals (RFP) / published advertisement
 - 4) Copies of bids submitted
 - 5) Method of bid evaluation
 - 6) Board/Council acceptance of successful bid
 - 7) Evidence of clear debarment status – System Award Management print
<https://www.sam.gov/portal/public/SAM/>
- d. Executed contracts, including Civil Rights Compliance and Section 3 compliance language

4. ENVIRONMENTAL REVIEW

- a. Environmental Review Record (ERR)
- b. Request for Release of Funds and Certification or Determination of Exemption
- c. Related correspondence
- d. ERR Letter from DOH

5. ACQUISITION/RELOCATION (if applicable)

- a. Acquisition Summary Checklist
- b. Documentation of real property acquisition, including correspondence, notices, etc.
- c. Acquisition/ Disposition Register
- d. Relocation Plan

6. EQUAL OPPORTUNITY (EO)

- a. Demographic profile
- b. Affirmative Action Plan notice posted in conspicuous place
- c. Grantee employment data
- d. Current chart of MBE/WBE contracts/subcontracts
- e. Current chart of Section 3 businesses
- f. Record to evidence promotion of employment and training to LMI businesses and individuals
- g. Fair Housing Activities
- h. Actions to implement Equal Opportunity (EO) employment practices
- i. Handicap Accessibility Self-evaluation checklist
- j. Non-violent demonstration policy
- k. Excessive use of force policy

7. LABOR STANDARDS – files must be organized by Prime Contractor, including subcontractor(s)

- a. Determination of Exemption letter (if applicable)
- b. Labor Standards Officer Designation form
- c. Force Account letter (if applicable)
- d. Copy of wage decision and Form 308
- e. Statement of applicable state and federal wage rates from DWD and DOL
- f. Report of classifications and wage decisions
- g. Statement of applicable state and federal wage rates from DWD and DOL
- h. HUD form 4010 applicable language
- i. Inspector's report on the required posting at the construction site of wage rates, hours, etc.
- j. Weekly payroll reports for each contractor and subcontractor

- k. Weekly statement of compliance for each contractor/subcontractor
- l. Employee interview reports
- m. Identification of underpayments (if any) and correction by grantee
- n. Semi-Annual CDBG Reports
- o. Final Labor Standards Compliance Report

CONTRACTOR:

- p. Pre-construction Report/Minutes
- q. Contractor verification including applicable construction certifications and licenses
- r. Evidence of clear debarment status – System Award Management print <https://www.sam.gov/portal/public/SAM/>
- s. Notice of Award Letter to Contractor
- t. Notice to Proceed Letter

8. FINANCIAL MANAGEMENT

- a. Depository Certification
- b. Signature Certification
- c. Financial Contact Person form
- d. Drawdown Register
- e. Request for Disbursement (Drawdown Requests)
- f. Cash Control Register
- g. Disbursements Journal
- h. Source Documentation for Disbursements: e.g., invoices documenting expenditures
- i. Approval signature by engineer/architect for construction invoices evidencing completion of work according to payment requests
- j. Canceled checks, if applicable
- k. Evidenced Deposits
- l. Bank statements, deposit slips, etc.
- m. Matching Funds Journal
- n. Business Matching Funds Journal (PFED)
- o. Source documentation for matching funds, including invoices, donation checks, other checks and canceled checks

9. REPORTS

- a. Semiannual Narrative Report on Accomplishments (reporting accomplishments toward Project Scope of Work, as outlined in the Grant Agreement)
- b. Accomplishment Data
- c. MBE/WBE Reports
- d. Section 3 Reports

- e. Employment and training accomplishments (if applicable)

10. CLOSEOUT

- a. Signed Closeout Report and supporting documents, as submitted to the Department
- b. Closeout Letter from DOH

11. SINGLE AUDIT

- a. Single Audit Report Statement
- b. Annual Correspondence to the Department (if applicable).
- c. Copy of Single Audit Report(s) (if applicable)
- d. Resolution of findings documentation (if applicable)

When the project is nearing completion, the DOH program representative has the discretion to send the UGLG the Self-Monitoring Checklist (refer to Attachment 2-A) to complete and return to DOH for a review and accuracy check. UGLGs shall complete this form on their own in order to ensure compliance with the grant requirements. This form may also be used during on-site monitoring visits by the DOH program representative.

GRANT AGREEMENT

DOH will mail the Grant Agreement to the successful grant recipients for review and signature. The Grant Agreement will be based upon the application submitted by the UGLG and will contain the budget, scope of work, timetable, use of program income and commitment of additional funds, as stated in the application. In addition, the Grant Agreement includes standard or “boiler plate” language to ensure compliance with State and Federal requirements.

When you receive the proposed Agreement, review it immediately. Notify the DOH representative of any necessary changes.

If the terms are satisfactory, please have the Chief Elected Official (CEO) sign and date two original copies. Return both copies of the signed Agreement to DOH for signature. After DOH signs the Agreement, a copy of the fully executed Agreement will be returned to the UGLG.

DOH makes grant awards of specific dollar amounts for particular activities. If funded projects are completed for a lesser amount than was

originally budgeted, the excess CDBG grant funds will be recaptured by DOH and used to fund future grants.

MONITORING

The CDBG UGLGs will be monitored at least once during the performance period of their Grant Agreement. The monitoring will be completed using one of the following options:

1. Desk Monitoring

The UGLG will be asked to complete the self-monitoring checklist. The UGLG will be asked to provide copies of relevant supporting documentation to the DOH representative. In addition, a DOH representative will complete a thorough monitor review of the Grantee's documents on file with the DOH.

2. On-site Monitoring Visit

When a DOH representative visits your community to monitor the local CDBG program, you can expect the following:

- The UGLG will be notified in advance of the monitoring visit. A DOH representative will never pay a “surprise” visit to your office. Dates and times are usually not negotiable unless unforeseen circumstances arise.
- The UGLG will receive a letter and/or email prior to the monitoring visit describing when the representatives will arrive and the scope of monitoring.
- The UGLG will be requested to provide a conference room or other enclosed area in which at least two people can work comfortably.
- Representatives from DOH or HUD have the right to review any file or record that is associated with the CDBG program whether paper or electronic copy. UGLGs are required to provide access to all of the CDBG files.
- To the extent you are able to have the necessary forms and documentation ready and available for review, your monitoring visit will go quickly and smoothly.

- The DOH representatives monitoring your program will use the forms listed in Attachment 2-A.

ATTACHMENTS

Attachments for this Chapter can be found on the following pages.

***** REMINDER:** The term “Unit(s) of General Local Government” which is also referred to by its acronym “UGLG(s)”, and the term “Grantee(s)” are used interchangeably throughout this Implementation Handbook. ***

ATTACHMENT 2-A: SELF-MONITORING CHECKLIST

CDBG GRANTEE'S SELF-MONITORING CHECKLIST Complete the following document and submit to your designated Division of Housing Project Representative, as requested.	
Grantee:	
CDBG Grant Agreement Number:	
Reviewer's Name and Title: <i>(person completing this form)</i>	
Date Completed:	Reviewer's Phone Number:
I attest that the information herein is true and correct. _____ Date Signed	
_____ Signature of Chief Elected Official	_____ Printed Name of Elected Official and Title

At the end of the contracted Performance Period (as stated in your signed CDBG Grant Agreement), **all CDBG Grantees must complete this Self-Monitoring Checklist and then sign & return this document to your designated Program Representative in the Wisconsin Department of Administration's Division of Housing.** Completion of this Self-Monitoring Checklist plays an important role in initiating the wrap-up of the grant through a formal Project Monitoring & Closeout process, which allows for final disbursement (i.e. "payment") requests to be processed & approved (provided that the other requirements of the grant have been fully met, as stated in your signed CDBG Grant Agreement).

INSTRUCTIONS:

1. Complete this Self-Monitoring Checklist.
2. Review your CDBG Grant project folder and marking the "Yes", "No", "Not Applicable (N/A)", and/or "Date" fields (where appropriate) to indicate that you either do or do not have each of the listed documents & described information currently stored within your on-site CDBG Grant project folder.
3. Sign & date the document.
4. Make & retain a copy of the signed & dated document for your records.
5. Return this completed document (preferably in an electronic PDF format, via email) to your designated Program Representative in the Wisconsin Department of Administration's Division of Housing by the date indicated in the letter that accompanied this document.

CDBG-PF Implementation Handbook

1. General Administration Documentation: (Indicate whether the following items are present within your CDBG Grant project folder.)		YES	NO	N/A	Date:
Application Documents					
Application (signed) and Supporting Attachments, as submitted to the Department					
Citizen Participation Documents					
Citizen Participation Plan					
Citizen Participation Plan Adopting Resolution					
Date of Adoption:					
Citizen Participation Public Hearing Notices:					
Citizen Participation Hearing 1 (list date of the posting)					
Citizen Participation Hearing 2 (list date of the posting)					
Citizen Participation Public Hearing Minutes or Certification:					
Citizen Participation Hearing 1 (list date of the hearing)					
Citizen Participation Hearing 2 (list date of the hearing)					
Copies of the Citizen Participation Public Hearing Sign-In Sheets (not required if the Meeting Minutes list the Hearing Attendees & Participants)					
Sign-In Sheet(s) for Citizen Participation Hearing 1					
Sign-In Sheet(s) for Citizen Participation Hearing 2					
Income Survey Documents					
Was an Income Survey conducted for this project? If YES , check for the following items in the file:					
Income Surveys which were completed and returned					
Income Survey Methodology used (including the distribution process, calculations, etc.)					
Income Survey Area Map					

2. Grant Agreement Documentation: (Indicate whether these items are present within your CDBG Grant project folder.)		YES	NO	N/A	Date:
Award letter(s)					
Agreement / "Contract" (specify final date signed by all parties)					
Amendment(s): <i>If applicable, list total number: _____</i>					
Amendment 1 (specify final date signed by all parties)					
Amendment 2 (specify final date signed by all parties)					
Amendment 3 (specify final date signed by all parties)					

3. Procurement Documentation: (Indicate whether these items are present within your CDBG Grant project folder.)		YES	NO	N/A	Date:
Grantee's Procurement Policy					
Conflict of Interest Evidenced Waiver Process (if applicable).					
Sealed Bid Process and Bid Opening Requirements Documentation*					
The Request for Proposal (RFP) states requirements for services and project specifications*					

CDBG-PF Implementation Handbook

The RFP identified all significant evaluation factors including price and their relative importance*				
The RFP was published*				
Copies of the sealed bids submitted*				
Proposals that were solicited from an adequate number of providers (Total number solicited* = _____)				
All proposals were evaluated and the evaluation is documented*				
The award(s) was made to the consultant/vendor/provider whose proposal was most advantageous to the UGLG after all factors were considered*				
Board/Council Acceptance of the Successful Bid Documentation*				
Signed Lobbying forms from all contractors receiving awards in excess of \$100,000*				
Executed contracts, including Civil Rights Compliance and Section 3 compliance language.*				

**Items may also be maintained in the Labor Standards file if relevant labor standards requirements apply, as detailed in the Labor Standards chapter of the Program-specific CDBG Implementation Handbook.*

Procurement Transactions Documentation:

Names of Consultants/Vendors/Providers	Method(s) of Procurement
	___ Competitive, or ___ Non-Competitive
	___ Competitive, or ___ Non-Competitive
	___ Competitive, or ___ Non-Competitive
	___ Competitive, or ___ Non-Competitive
	___ Competitive, or ___ Non-Competitive
	___ Competitive, or ___ Non-Competitive
	___ Competitive, or ___ Non-Competitive

4. Environmental Review Documentation: (Indicate whether these items are present within your CDBG Grant project folder.)	YES	NO	N/A	Date:
Has the UGLG prepared, maintained, and made available for public inspection a project Environmental Review Record (ERR)?				
Did the ERR contain a signed copy of the UGLG's <u>Request for Release of Funds and Certification</u> form (HUD form 7015.15) or a Determination of Exemption?				
Did the ERR contain the Department of Administration Certification letter? (If YES , indicate the date of the letter.)				
Were CDBG costs expended or obligated, except for exempt activities (24 CFR 58.34), prior to the date on the Department of Administration Certification letter? (If YES , indicate the earliest date of CDBG costs expended/obligated.)				
Were any <i>non</i> -CDBG project costs expended or obligated except for exempt activities (24 CFR 58.34), prior to the date on the Department of Administration Certification letter? (If YES , indicate the earliest date of non-CDBG costs expended or obligated.)				

CDBG-PF Implementation Handbook

5. Acquisition & Relocation Documentation: (Indicate whether these items are present within your CDBG Grant project folder.)	YES	NO	N/A	Date:
Acquisition Summary Checklist				
Documentation of real property acquisition, including correspondence, notices, etc.				
Notice of Intent to Acquire/Preliminary Acquisition Notice				
Did the UGLG provide the owner an adequate Notice of Land Acquisition Procedures, and given to owner in advance of initiating negotiations? (Refer to brochures: <i>WI Relocation Rights/Rights of Landowner Under WI Eminent Domain Law</i> , and <i>Your Relocation Rights</i>)				
Was the owner invited to accompany all of the appraisers on their inspection of the property?				
Appraisal Conducted (Copy of the Appraisal)				
Are the data contained in the appraisals adequate to determine Fair Market Value (FMV)?				
Are the analyses of the data in the appraisals reasonable?				
Do the appraisals disregard the influence of the project on the FMV of the property				
Is the amount determined to be "Just Compensation" an acceptable conclusion of the FMV of the property?				
Review of Appraisal Conducted				
Initiation of Negotiations:				
Did the Grantee provide owner(s) with a Statement of the Basis for the Determination of "Just Compensation" at the time the owner was given the written offer to purchase?				
Did the owner receive the amount determined to be "Just Compensation"?				
Condemnation procedures (if applicable)				
Estimated just compensation deposited with court (condemnation only)				
Final Contract				
Grantee takes title				
90-day Notice to vacate property (if applicable)				
Disposition/Acquisition Register				
Relocation Plan				

6. Equal Opportunity Documentation: (Indicate whether these items are present within your CDBG Grant project folder.)	YES	NO	N/A	Date:
Demographic profile of Grantee's community or target area which approximates the census profile				
Affirmative Action Plan notice posted in a conspicuous place (if applicable)				
Record of evidence demonstrating promotion of employment and training opportunities to LMI businesses and individuals				
Section 3 job creation tracking system and reports*				
Section 3 contract language is inserted into contract				

CDBG-PF Implementation Handbook

document(s)*				
Has the Grantee made their best efforts to employ Section 3 businesses?				
Has the Grantee made their best efforts to employ MBE/WBE businesses?				
Minority and Women Business Enterprises (MBE/WBE) tracking system and reports*				
Executive Order 11246 language inserted into contract document?*				
Fair Housing Efforts Documentation*				
Briefly list efforts made:				
Handicap Accessibility Self-Evaluation Checklist (if applicable)				
<i>*Items may also be maintained in the Procurement or Reporting files.</i>				

7. Labor Standards Documentation: <small>(Indicate whether these items are present within your CDBG Grant project folder.)</small>	YES	NO
Do labor standards apply to this project?		
<i>If No, explain and skip to Section 8:</i>		
<i>If Yes, complete the following:</i>		
Name and phone numbers of Labor Standards Officer:		
Is a formal designation of the labor standards officer on file and up to date?		
Make a copy of the items below with an asterisk (*) and complete the information for each prime contract awarded under separate bid(s): <div style="display: flex; justify-content: space-between; margin-top: 10px;"> <div style="width: 60%;"> <p>*Project No. (CDBG # and Line Item #):</p> <p>*Bid Advertisement Date:</p> <p>*Contract Award Date:</p> <p>*Wage Decision # and Date:</p> <p>*Modification # and Date:</p> </div> <div style="width: 35%;"> <p>*Bid Opening Date:</p> <p>*Construction Start Date:</p> </div> </div>		
Labor Standards (continued)	YES	NO
Has the Grantee completed and submitted Semiannual Fair Labor Standards Enforcement Report(s) for the project period. Dates of project period: From (month/year)_____ To (month/year) _____ _____ = Total # Reports		
Has the Grantee completed and submitted a Final Fair Labor Standards Compliance Report?		
Is a system in place to ensure that all payrolls and related records are maintained by the Grantee until informed by the DOH Division Administrator (or designee) that CDBG project records may be discarded?		

CDBG-PF Implementation Handbook

Is a Force Account Letter on file? (if applicable – for project not subject to Davis-Bacon due to being a public works project completed by municipality employees)								
Complete the following by circling Yes, No, or N/A.	Prime #1	Prime #2	Sub #1	Sub #2	Sub #3	Sub #4	Sub #5	Sub #6
CONTRACTOR(S) NAME(S)								
Is there a specific file for this project?	Yes No	Yes No	Yes No	Yes No	Yes No	Yes No	Yes No	Yes No
Did the Grantee follow state law and OMB A 102 in awarding this prime contract?	Yes No	Yes No	N/A	N/A	N/A	N/A	N/A	N/A
Contractor Information (continued)								
Complete the following by circling Yes, No, or N/A.	Prime #1	Prime #2	Sub #1	Sub #2	Sub #3	Sub #4	Sub #5	Sub #6
Is wage decision(s) included in bid document(s) \$ construction contract(s)?	Yes No	Yes No	Yes No	Yes No	Yes No	Yes No	Yes No	Yes No
Is the HUD 4010 Labor Standards Provision in the construction bid specification(s) and contract(s)?	Yes No	Yes No	Yes No	Yes No	Yes No	Yes No	Yes No	Yes No
Are wage decision(s) posted in an area accessible to all employees?	Yes No	Yes No	Yes No	Yes No	Yes No	Yes No	Yes No	Yes No
Have all contractors/subcontractors submitted their IRS Employer Identification Number?	Yes No	Yes No	Yes No	Yes No	Yes No	Yes No	Yes No	Yes No
Are payrolls submitted weekly or "no work" letter(s) filed?	Yes No	Yes No	Yes No	Yes No	Yes No	Yes No	Yes No	Yes No
Are payrolls numbered (initial to final)?	Yes No	Yes No	Yes No	Yes No	Yes No	Yes No	Yes No	Yes No
Does an authorized person of the company sign the certified payroll(s)?	Yes No	Yes No	Yes No	Yes No	Yes No	Yes No	Yes No	Yes No
Are all workers' last four digits of social security numbers and addresses shown on at least the first payroll?	Yes No	Yes No	Yes No	Yes No	Yes No	Yes No	Yes No	Yes No
Do hourly wage rates shown on the payroll equal or exceed the wage rates in wage decision(s)?	Yes No	Yes No	Yes No	Yes No	Yes No	Yes No	Yes No	Yes No
Is there Form 4230A (additional classification) for those classifications not shown in the wage decision?	Yes No N/A	Yes No N/A	Yes No N/A	Yes No N/A	Yes No N/A	Yes No N/A	Yes No N/A	Yes No N/A
Is time and a half paid to workers for work performed over 40 hours per	Yes No	Yes No	Yes No	Yes No	Yes No	Yes No	Yes No	Yes No

week?	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
If worker is listed in two classifications, did s/he sign the payroll, or was a daily time record submitted?	Yes No N/A	Yes No N/A	Yes No N/A	Yes No N/A	Yes No N/A	Yes No N/A	Yes No N/A	Yes No N/A
Are "other" deductions properly documented?	Yes No N/A	Yes No N/A	Yes No N/A	Yes No N/A	Yes No N/A	Yes No N/A	Yes No N/A	Yes No N/A
Contractor Information (continued)								
Complete the following by circling Yes, No, or N/A.	Prime #1	Prime #2	Sub #1	Sub #2	Sub #3	Sub #4	Sub #5	Sub #6
Are HUD 11s completely filled out, compared with payrolls, & signed by payroll examiner?	Yes No N/A	Yes No N/A	Yes No N/A	Yes No N/A	Yes No N/A	Yes No N/A	Yes No N/A	Yes No N/A
Number of HUD 11s complete:								
Are the proper apprentice/trainee indentures attached to payrolls where such employees appear?	Yes No N/A	Yes No N/A	Yes No N/A	Yes No N/A	Yes No N/A	Yes No N/A	Yes No N/A	Yes No N/A
Are apprentices/trainees working alone?	Yes No N/A	Yes No N/A	Yes No N/A	Yes No N/A	Yes No N/A	Yes No N/A	Yes No N/A	Yes No N/A
Does payroll examiner sign off on payouts of wage underpayments?	Yes No N/A	Yes No N/A	Yes No N/A	Yes No N/A	Yes No N/A	Yes No N/A	Yes No N/A	Yes No N/A

Wage Underpayments Collected Monies?	Yes No N/A	Yes No N/A	Yes No N/A	Yes No N/A	Yes No N/A	Yes No N/A	Yes No N/A	Yes No N/A
Amount Collected:	\$	\$	\$	\$	\$	\$	\$	\$
Are all violations resolved?	Yes No N/A	Yes No N/A	Yes No N/A	Yes No N/A	Yes No N/A	Yes No N/A	Yes No N/A	Yes No N/A
If all violations are NOT resolved, explain why & provide their current status(es):								
Wage Underpayments due to Unpaid Overtime Collected Monies per HUD CWHSSA?	Yes No N/A	Yes No N/A	Yes No N/A	Yes No N/A	Yes No N/A	Yes No N/A	Yes No N/A	Yes No N/A
Amount Collected:	\$	\$	\$	\$	\$	\$	\$	\$
Are all violations resolved?	Yes No N/A	Yes No N/A	Yes No N/A	Yes No N/A	Yes No N/A	Yes No N/A	Yes No N/A	Yes No N/A
If all violations are NOT resolved, explain why & provide their current status(es):								
Other comments or recommendations:								

List Names and the corresponding Employer I.R.S. Identification Number of all Prime Contractor(s):

Contractor:	Name:	Employer I.R.S. Identification Number:
Prime Contractor #1		
Prime Contractor #2		
Prime Contractor #3		
Prime Contractor #4		
Prime Contractor #5		
Prime Contractor #6		
Prime Contractor #7		

List names and Employer IRS Identification Number of all Sub-Contractor(s):

Sub-Contractor:	Name:	Employer I.R.S. Identification Number:
Sub-Contractor #1		
Sub-Contractor #2		
Sub-Contractor #3		
Sub-Contractor #4		
Sub-Contractor #5		
Sub-Contractor #6		
Sub-Contractor #7		
Sub-Contractor #8		

8. Financial Management Documentation: (Indicate whether these items are present within your CDBG Grant project folder.)				
Bank Documents:	YES	NO	N/A	Date:
Depository Certification form				
Signature Certification form				
Financial Contact Person form				
Bank Statements				
Disbursements ("Drawdowns") Documents:	YES	NO	N/A	Date:
Request for Disbursement (Draw) forms				
Notification of Deposit (e.g., deposit slip)				
Cash Control Register (CCR) Documents:	YES	NO	N/A	Date:
CCR copies all in file				
Deposit dates agree with the date deposit notifications were received from bank				
Disbursement dates agree with the Disbursements Journal and check register				
Reports balance of cash on hand each day a disbursement or deposit was made				
Account does not have more than \$5,000 of federal cash on hand for more than three days. Exceptions noted:				
Is mathematically correct				
Cumulative Disbursements to date per CCR:	\$			
Total payments to date per Disbursements Journal:	\$			
The adjusted balance and balance per bank statement dated:				

CDBG-PF Implementation Handbook

Balance per CCR:	\$			
(-) Deposits in Transit	\$			
(+) Checks Outstanding	\$			
(=) Adjusted Balance	\$			
Comments:				
Disbursements Journal Documents:	YES	NO	N/A	Date:
Disbursement Journal copies all in file				
Reports the award amount, budget codes, activities and amounts in the header row				
Accounts for the sequence of grant checks issued and indicates which, if any, are voided				
Corresponds to checks issued and bank statements with regard to amount, date, payee				
Reports disbursements per month, in total and by budget activity, monthly				
Reports cumulative disbursements to date in total and by budget activity, monthly				
Reports the available balance, in total and by budget category, monthly				
Source documentation is mathematically correct				
Source documentation for disbursements: (e.g., invoices from contractors and others, canceled checks, engineer approval of expenditures)				
Comments:				
Matching Funds Journal:	YES	NO	N/A	Date:
Matching Funds Journal copies all in file				
Cumulative match equals/exceeds the contracted "commitment of other parties" amount				
Lists each check number, date, and payee claimed as match				
Are CDBG funds deposited into same account from which grantee is claiming match?				
Source documentation: (e.g., invoices from contractors and others, canceled checks, engineers approval of expenditures)				

Comments:

9. Reporting Documentation: (Indicate whether these items are present within your CDBG Grant project folder.)	YES	NO	N/A	Date:
Semiannual Narrative Reports on Accomplishments with Grantee Certification Signature:				
Reporting Period #1 from _____ through _____				
Reporting Period #2 from _____ through _____				
Reporting Period #3 from _____ through _____				
Reporting Period #4 from _____ through _____				
Semi-Annual Fair Labor Standards Reports*				
Semi-Annual MBE/WBE Reports*				
Section 3 Reports*				
Semi-Annual Equal Opportunity Reports*				
LMI Job Creation/Retention Records Reporting				
Is/Was there a construction sign posted for the project(s)?*				
<i>*Items may also be maintained in the Labor Standards file.</i>				

10. Closeout Documentation: (Indicate whether these items are present within your CDBG Grant project folder.)	YES	NO	N/A	Date:
Signed Program Closeout Report and Supporting Documents, as submitted to the Department				
Evidence of Payment of Claims after Submittal of Closeout Report				

11. Single Audit Documentation: (Indicate whether these items are present within your CDBG Grant project folder.)	YES	NO	N/A	Date:
Single Audit Report Statement				
Annual Correspondence for Single Audit to DOH (if applicable) For year(s): _____ to _____				
Copies of required Single Audit Reports (if applicable)				
Resolution of Findings documentation (if applicable)				

12. PFED Project Documentation: (if applicable) <small>(Indicate whether these items are present within your CDBG Grant project folder.)</small>	YES	NO	N/A	Date:
Job Creation/Retention Efforts (list of positions and classifications)*				
Position details, including status, wages health benefits, retention or creation*				
Employee self-certification status forms*				
Beneficiary data, including LMI, ethnicity, race, and gender*				
*Items may also be maintained in the Reports file.				

Other Monitoring Notes and Considerations:

EXIT INTERVIEW PARTICIPANTS:			<small>APPLICABLE IF THE MONITORING WAS PERFORMED BY A THIRD PARTY DESIGNATED BY THE GRANTEE OR BY A DOH REPRESENTATIVE</small>
Participant's Name:	Participant's Phone #:	Participant's Email:	

ATTACHMENT 2-B: Title 24 PART 570 Subpart I

Code of Federal Regulations Title 24 PART 570 Subpart I

Sec. 489 Program administrative requirements

(h) Conflict of interest:

(1) Applicability. (i) In the procurement of supplies, equipment, construction, and services by the States, units of local general governments, and sub-recipients, the conflict of interest provisions in paragraph (g) of this section shall apply.

(ii) In all cases not governed by paragraph (g) of this section, this paragraph (h) shall apply. Such cases include the acquisition and disposition of real property and the provision of assistance with CDBG funds by the unit of general local government or its sub-recipients, to individuals, businesses and other private entities.

(2) Conflicts prohibited. Except for eligible administrative or personnel costs, the general rule is that no persons described in paragraph (h)(3) of this section who exercise or have exercised any functions or responsibilities with respect to CDBG activities assisted under this subpart or who are in a position to participate in a decision-making process or gain inside information with regard to such activities, may obtain a financial interest or benefit from the activity, or have an interest or benefit from the activity, or have an interest in any contract, subcontract or agreement with respect thereto, or the proceeds thereunder, either for themselves or those with whom they have family or business ties, during their tenure or for one year thereafter.

(3) Persons covered. The conflict of interest provisions for paragraph (h)(2) of this section apply to any person who is an employee, agent, consultant, officer, or elected official or appointed official of the state, or of a unit of general local government, or of any designated public agencies, or sub-recipients which are receiving CDBG funds.

(4) Exceptions: Thresholds requirements. Upon written request by the State, an exception to the provisions of paragraph (h)(2) of this section involving an employee, agent, consultant, officer, or elected official or appointed official of the state may be granted by HUD on a case-by-case basis. In all other cases, the state may grant such an exception upon written request of the unit of general local government provided the state shall fully document its determination in compliance with all requirements of paragraph (h)(4) of this section including the state's position with respect to each factor at paragraph (h)(5) of this section and such documentation shall be available for review by the public and by HUD. An exception may be granted after it is determined that such an exception will serve to further the purpose of the Act and the

effective and efficient administration of the program or project of the state or unit of general local government as appropriate. An exception may be considered only after the state or unit of general local government, as appropriate, has provided the following:

(i) A disclosure of the nature of the conflict, accompanied by an assurance that there has been public disclosure of the conflict and a description of how the public disclosure was made; and

(ii) An opinion of the attorney for the state or the unit of general local government, as appropriate, that the interest for which the exception is sought would not violate state or local law.

(5) Factors to be considered for exceptions. In determining whether to grant a requested exception after the requirements of paragraph (h)(4) of this section have been satisfactorily met, the cumulative effect of the following factors, where applicable, shall be considered:

(i) Whether the exception would provide a significant cost benefit or an essential degree of expertise to the program or project which would otherwise not be available;

(ii) Whether an opportunity was provided for open competitive bidding or negotiation;

(iii) Whether the person affected is a member of a group or class of low or moderate income persons intended to be the beneficiaries of the assisted activity, and the exception will permit such person to receive generally the same interests or benefits as are being made available or provided to the group or class;

(iv) Whether the affected person has withdrawn from his or her functions or responsibilities, or the decision-making process with respect to the specific assisted activity in question;

(v) Whether the interest or benefit was present before the affected person was in a position as described in paragraph (h)(3) of this section;

(vi) Whether undue hardship will result either to the State or the unit of general local government or the person affected when weighed against the public interest served by avoiding the prohibited conflict; and

(vii) Any other relevant considerations.

ATTACHMENT 2-C: PROJECT SIGN SPECIFICATIONS

The following sign (*pictured as an example on the next page*) is to be erected near the site of construction, containing the indicated information (below) according to the following format.

SPECIFICATIONS:

Sign dimensions: 4 feet by 8 feet
Plywood panel APA Rated A-B Grade-Exterior
White background
Following text in **red**:

**A COMMUNITY FACILITIES PARTNERSHIP
FINANCED IN PART BY COMMUNITY DEVELOPMENT BLOCK GRANT FUNDS
FROM THE WISCONSIN DEPARTMENT OF ADMINISTRATION
& THE DEPARTMENT OF HOUSING & URBAN DEVELOPMENT**

All other text in black

PLEASE NOTE: The smallest print must be readable
from 50 feet away.

ATTACHMENT 2-D: EXAMPLE PROJECT SIGN

Community Name:

Project Type: (i.e. Water Tower, Library, Community Center)

A COMMUNITY FACILITIES PARTNERSHIP
FINANCED IN PART BY COMMUNITY DEVELOPMENT BLOCK GRANT FUNDS
**FROM THE WISCONSIN DEPARTMENT OF ADMINISTRATION &
THE DEPARTMENT OF HOUSING & URBAN DEVELOPMENT**

Scott Walker, Governor

Mike Huebsch, Secretary

Community Official's Name & Title *(i.e. Mayor, Village President, Chair)*

State and Federal Equal Opportunity laws apply in the construction and use of this project

ADDITIONAL NOTES: (optional)

ADDITIONAL NOTES (continued): (optional)